

# **EXHIBIT A**

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19  
20     **UNITED STATES DISTRICT COURT**  
20     **NORTHERN DISTRICT OF CALIFORNIA**

21     CHASOM BROWN, WILLIAM BYATT,  
22     JEREMY DAVIS, CHRISTOPHER  
22     CASTILLO, and MONIQUE TRUJILLO  
23     individually and on behalf of all similarly  
23     situated,

24                Plaintiffs,

25     vs.

26     GOOGLE LLC,

28                Defendant.

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Case No.: 5:20-cv-03664-LHK

**[PROPOSED] ORDER RE: PRIVILEGE  
LOG DISPUTE**

The Honorable Susan van Keulen  
Courtroom 6 - 4th Floor

1 [PROPOSED] ORDER

2 Before the Court is the parties' Joint Submission Re: Google Privilege Log Dispute. ("Joint  
3 Submission"). Having considered the parties' Joint Submission, and good cause having been  
4 shown, the Court **ORDERS** as follows:

- 5 • Google shall designate a senior attorney to (i) re-review the privilege log entries  
6 challenged by Plaintiffs; (ii) revise the privilege log to identify with particularity  
7 the counsel whose legal advice is purportedly at issue and describe with greater  
8 specificity the nature of the privileged material withheld in each document (as  
9 opposed to, for example, Google's inaccurate, boilerplate descriptions of  
10 "Memoranda" reflecting legal advice); (iii) produce any documents that, upon  
11 further review, are not privileged; and (iv) submit a declaration confirming that  
12 there is a factual and legal basis for withholding the remaining documents as  
13 privileged. Google shall do so within one week of this order; and  
14 • After that review is complete, Plaintiffs may select a sample of Google's withheld  
15 or redacted documents for in camera review by the Court (which then may provide  
16 further grounds for resolving of Google's remaining privilege claims).

17 **IT IS SO ORDERED.**

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19 DATED: \_\_\_\_\_

20 Honorable Susan van Keulen  
21 United States Magistrate District Judge  
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